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12 *Kelsy Arlitz and Gary Arlitz and Karie Arlitz*
12 *as General Guardians of Kelsy Arlitz*
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14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 KELSY ARLITZ, individually; GARY
17 ARLITZ, as general guardian of ward KELSY
18 ARLITZ; KARIE ARLITZ, as general
18 guardian of ward KELSY ARLITZ,

19 Plaintiffs,

20 vs.

22 GEICO CASUALTY COMPANY; DOES 1
22 through 100 and ROE CORPORATIONS 1
23 through 100, inclusive,

24 Defendants.

Case No.: 2:19-cv-00743-RFB-DJA

**STIPULATION AND
[PROPOSED] ORDER TO
EXTEND DEADLINE FOR
PLAINTIFFS TO FILE THEIR
RESPONSE TO DEFENDANT
GEICO CASUALTY COMPANY'S
MOTION FOR SUMMARY
JUDGMENT ON COVERAGE
AND DUTY TO DEFEND (ECF
NO. 50)**

(Third Request)

26 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs KELSY
27 ARLITZ, individually; GARY ARLITZ, as general guardian of ward KELSY ARLITZ,
28 and KARIE ARLITZ, as general guardian of ward KELSY ARLITZ, through their



1 counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, and
 2 Defendant GEICO CASUALTY COMPANY, through its counsel of record, Wade M.
 3 Hansard and Jonathan W. Carlson of McCORMICK, BARSTOW, SHEPPARD, WAYTE
 4 & CARRUTH LLP, that the deadline for Plaintiffs to file their Response to Defendant
 5 GEICO Casualty Company's Motion for Summary Judgment on Coverage and Duty to
 6 Defend (ECF No. 50) shall be extended from October 9, 2020 to October 16, 2020. The
 7 Motion was filed on August 19, 2020. This is the third request for extension of time for
 8 Plaintiffs to file their Response to the Motion. This Stipulation and [Proposed] Order is
 9 submitted in accordance with LR IA 6-1.

10 The reason for this brief extension request is because the parties were only
 11 recently able to complete the deposition of GEICO claims examiner, Jeremy Rains, on
 12 October 7, 2020. Technical difficulties prevented the parties from conducting Mr.
 13 Rains's deposition on its previously scheduled date of September 30, 2020. The court
 14 reporter represented to the parties that she shall have Mr. Rains's deposition
 15 transcribed by Monday, October 12, 2020. Given that Mr. Rains was the primary claims
 16 employee involved in the coverage investigation that gives rise to this matter, his
 17 deposition testimony is relevant to the issues presented in GEICO's Motion for Summary
 18 Judgment. This short extension of time will allow Plaintiffs to present Mr. Rains's
 19 deposition to this Court as part of its consideration of GEICO's Motion for Summary
 20 Judgment.

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1 Accordingly, the parties respectfully request this Court to approve the foregoing
2 stipulation. Their requested extension is not made in bad faith or to unnecessarily delay
3 these proceedings.

4 DATED this 8th day of October, 2020.

5 DATED this 8th day of October, 2020

6 **PRINCE LAW GROUP**

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9 **McCORMICK, BARSTOW,
10 SHEPPARD, WAYTE & CARRUTH
11 LLP**

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/s/ Kevin T. Strong _____
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19 **ORDER**

20 **IT IS SO ORDERED.**

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RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

 DATED this 11th day of October, 2020.